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August 22, 2005

BY FAX (718) 260-2457

Hon. John Gleeson  
 United States District Judge  
 Eastern District of New York  
 225 Cadman Plaza East  
 Brooklyn, New York 11201

**FILED**  
 IN CLERK'S OFFICE  
 U.S. DISTRICT COURT E.D.N.Y.

★Aug 30 2005 ★

BROOKLYN OFFICE

Re: *United States v. Julio Carreras*, 05 CR 243 (JG) (E.D.N.Y.)

Dear Judge Gleeson:

I represent the above-named defendant and cooperating witness, who apparently is scheduled to be sentenced before Your Honor Aug. 26. I write to respectfully request an adjournment pending my completion of trial before Judge Scheindlin in *United States v. John A. Gotti*, 04 Cr. 690 (SAS) (S.D.N.Y.). We are working five days a week in the Gotti trial, which began Aug. 8 and is expected to last through at least mid-September. Because of this actual engagement, I have not had an opportunity to review the presentence report with Mr. Carreras or prepare a written submission on his behalf. To my knowledge, moreover, the government has yet to file a U.S.S.G. § 5K1.1 motion for my client. For these reasons, I respectfully ask the Court to postpone Mr. Carreras's sentencing until after the Gotti trial. Despite several phone calls, I have been unable to reach AUSA Jed Davis to secure his consent to this request. I thank the Court for its attention and consideration.

Respectfully yours,

Marc Fernich

cc: AUSA Jed Davis (718) 254-7480

s/John Gleeson



*Sentences is  
on for 10/28/05  
@ 2:00 PM*